

# **EMARD DANOFF PORT TAMULSKI & PAETZOLD LLP**

Andrew I. Port (State Bar # 120977)  
Katharine Essick (State Bar #219426)  
49 Stevenson Street, Suite 400  
San Francisco, CA 94105  
Tel. (415) 227-9455  
Fax (415) 227-4255  
Attorneys for Defendant  
HOPEWELL NAVIGATION INC.  
erroneously named as Hopwell  
Navigation, Inc.

# WELTIN LAW OFFICE

Patrick B. Streb  
1432 Martin Luther King Jr. Way  
Oakland, CA 94612  
Tel. (510) 251-6060  
Fax (510) 251-6040  
Attorneys for Plaintiff  
MIGUEL VALENCIA

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

MIGUEL VALENCIA

Case No.: C 05 02371 JCS

Plaintiff,

VS.

HYUNDAI MERCHANT MARINE  
COMPANY, LTD., HOPWELL  
NAVIGATION, INC. and DOES 1-20,

## Defendants.

**STIPULATION AND [PROPOSED]  
ORDER REGARDING PRETRIAL  
CALENDAR**

COME NOW PLAINTIFF MIGUEL VALENCIA AND DEFENDANT HOPEWELL NAVIGATION COMPANY AND HEREBY STIPULATE to the following revised pretrial calendar. This Stipulation and Proposed Order is proffered because the mediation return date in this case, originally scheduled for March 1, 2006, was continued until June 30, 2006, such that plaintiff might reach a state of medical permanency prior to mediation. The second Case Management Conference date, after which the stay on discovery will be lifted was, in turn,

1 continued to July 21, 2006.

2 The discovery cutoff date, originally set for August 1, 2006, shall now be November 1,  
3 2006. Expert disclosures, originally scheduled for August 1, 2006, will now be made no later  
4 than November 1, 2006. Expert discovery, originally to be completed by September 1, 2006,  
5 will now be completed no later than December 1, 2006.

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7 IT IS HEREBY STIPULATED.

8 Dated: May 28, 2006

WELTIN LAW OFFICE

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10 By \_\_\_\_\_ /S/  
11 Patrick B. Streb  
12 Attorneys for Plaintiff  
MIGUEL VALENCIA

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Dated: May 30, 2006

EMARD, DANOFF, PORT & TAMULSKI, LLP  
Andrew I. Port  
Katharine Essick

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20 **Certification of Signatures**

21 I attest that the content of this document is acceptable to all persons above, who were  
22 required to sign it.

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/S/  
Andrew I. Port

1 IT IS SO ORDERED.  
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3 Dated: June 16, 2006  
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